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12 KEUN TAEK PARK
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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 TOPPAN PHOTOMASKS, INC.,

19 Plaintiff,

20 vs.

21 KEUN TAEK PARK, an individual,

22 Defendant.

23 Case No. 3:13-cv-3323 MMC

24 STIPULATION AND [PROPOSED]
25 ORDER REGARDING DISCOVERY

26 Complaint Filed: July 17, 2013

27 Trial Date: November 10, 2014

28 Judge: Hon. Maxine M. Chesney

STIPULATION

2 Plaintiff Toppan Photomasks, Inc. (TPI) and Defendant Keun Taek Park
3 (collectively “the Parties”), participated in a settlement conference before Magistrate
4 Judge Corley on March 7, 2014. The Parties have a subsequent settlement conference
5 before Magistrate Judge Corley scheduled for April 28, 2014. In order to facilitate
6 preparations for the April 28 settlement conference, the Parties stipulate and request
7 that the following dates in the Pretrial Preparation Order (Dkt. No. 53) be modified
8 as follows:

- Non-Expert Discovery Cutoff extended from April 14, 2014 to June 9, 2014;
 - Designation of Experts extended from May 2, 2014 to June 9, 2014;
 - Designation of Rebuttal Experts extended from May 30, 2014 to June 23, 2014; and
 - Expert Discovery Cutoff extended from June 27, 2014 to July 7, 2014.

15 The Parties are not requesting that any other dates in the Pretrial Preparation
16 Order be extended at this time.

17 The Parties further stipulate and request that (a) prior to the April 28, 2014
18 settlement conference, the Parties will serve no additional discovery on each other
19 except that Mr. Park may serve written discovery on TPI regarding the May 3, 2013
20 email Mr. Park sent himself at CGI, and its attachment; and (b) that the Parties may
21 nonetheless follow-up on incomplete discovery already served on each other.

22 | So stipulated.

23 | DATED: March 14, 2014

THE BUSINESS LITIGATION GROUP, P.C.

24 By: /s/ Marc N. Bernstein

MARC N. BERNSTEIN WILL B. FITTON

Attorneys for Defendant
KEUN TAEK PARK

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2 DATED: March 14, 2014
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OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

4 By: /s/ Danielle Ochs
5

6 DANIELLE OCHS
BECKI D. GRAHAM

7 Attorneys for Plaintiff
8 TOPPAN PHOTOMASKS, INC.
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10 **ATTESTATION OF CONCURRENCE IN FILING**

11 In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the
12 filing of this document has been obtained from Danielle Ochs.
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14 **ORDER**

15 IT IS SO ORDERED.
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Dated: March 17, 2014



17 Honorable Maxine M. Chesney
18 United States District Judge
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